

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	
)	
)	
Plaintiff,)	
vs.)	Case No.
)	2:23-cv-6302-HDV-AJR
)	
CHEVRON USA, INC., a California)	
Corporation, and DOES 1 through)	
10, inclusive,)	
)	
Defendants.)	

REPORTER'S TRANSCRIPT

VIDEOTAPED DEPOSITION OF

DR. ESHIOFE ASEKOMEH

Thursday, October 10, 2024

Via Zoom Video Conferencing

7:03 a.m.

Reported by: Rachel N. Barkume, CSR, RMR, CRR
Certificate No. 13657

Dr. Eshiofe Asekomeh

October 10, 2024

A P P E A R A N C E S

FOR THE PLAINTIFF:

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FOR THE DEFENDANT:

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THE VIDEOGRAPHER:

Jacob Rivera

ALSO PRESENT:

Eguono Erhun, In-House Counsel for Chevron

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1 foundation. Let me just -- Doctor, when I object,
2 unless I instruct you not to answer, you should still
3 answer the question. I'm just making objections for the
4 record. So unless I'm instructing you not to answer, go
5 ahead and answer her questions.

6 THE WITNESS: Okay. So by the nature of this
7 contract, Deep Drill is providing medical services to
8 Chevron by supplying manpower, doctors and nurses.

9 BY MS. LEAL:

10 Q. Do you know if Deep Drill Oil Services provides
11 medical services to any other companies other than
12 Chevron, or is Chevron the only client?

13 A. I don't know.

14 MR. MUSSIG: Calls for speculation.

15 BY MS. LEAL:

16 Q. So prior to 2020, who was your employer?

17 A. So prior to 2020, my employer was Delog Nigeria
18 Limited, D-E-L-O-G, Delog Nigeria Limited.

19 Q. So prior to 2020, your employer was Delog
20 Nigeria Limited?

21 A. Yes. That's D-E-L-O-G.

22 Q. So what business was Delog Nigeria Limited in
23 at the time?

24 MR. MUSSIG: Calls for speculation. Lacks
25 foundation.

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1 THE WITNESS: Okay. So -- so for my group, it
2 was, again, provision of manpower, doctors and nurses,
3 to Chevron in this instance.

4 BY MS. LEAL:

5 Q. Okay. Do you know if Delog Nigeria Limited
6 provided doctors and nurses to other companies other
7 than Chevron at the time?

8 MR. MUSSIG: Calls for speculation.

9 THE WITNESS: I don't know.

10 BY MS. LEAL:

11 Q. Okay. Has Chevron directly ever paid your
12 salary?

13 A. No.

14 Q. So the work that you did for Chevron was paid
15 either by Delog Nigeria Limited or by Deep Drill Oil
16 Services in conjunction with the contract that those
17 companies had with Chevron; is that correct then?

18 A. Can you rephrase that question?

19 Q. Yes. I want to make sure I understand.

20 Prior to 2020, and since then, all of the work
21 that you have performed for Delog Nigeria Limited and
22 Deep Drill Oil Services was work that you did in
23 connection with services for Chevron.

24 A. Yes.

25 Q. Other than Chevron, did you have any other

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1 So it's a back-and-forth process that we are --
2 until is complete. Now, outside that checklist, if any
3 of the results has an abnormality -- even before it
4 starts to you, it's a doctor-to-doctor thing. So you
5 send me a result that is borderline, and you know ahead
6 I'm going to ask why the result is borderline.

7 If you need to do a further evaluation, that
8 evaluation is already done. But if it is not, then ask
9 them back and say, this person has borderline or this
10 result is abnormal, you want to run for that check to
11 strengthen or to confirm what is really going on until
12 you have everything that you can make your determination
13 with.

14 Q. So in this case, you conducted an MSEA for Mark
15 Snookal in 2019 who at the time was employed in
16 California.

17 Do you recall that?

18 A. Yes.

19 Q. And you do recall that Mark Snookal had an
20 aortic dissection or an aortic aneurysm?

21 A. Okay. So we need to differentiation between
22 aortic dissection and aneurysm. So the condition is
23 aortic aneurysm or aortic dilatation. When it gets
24 complicated, it starts dissecting or it ruptures. So a
25 dissection is pathway to rupturing.

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1 The doctor also commented that he had annual
2 echocardiogram and annual chest CT scans as a way of
3 monitoring that aortic aneurysm. So those results were
4 also attached, and those results are not normal part of
5 an MSEA from the MEP program. So that already makes the
6 case different from the normal case.

7 So at that point, I looked at those records and
8 then involved the cardiologists to do a review. The
9 three cardiologists did a review and looked at the
10 records, the results of investigations, because I wanted
11 them to, as cardiologists, look at the results and
12 confirm, determine risk and possible complications.

13 Q. So after all of that, a determination was made
14 that Mr. Snookal was unfit for duty; correct?

15 MR. MUSSIG: Vague and ambiguous.

16 THE WITNESS: Okay. So --

17 BY MS. LEAL:

18 Q. My question -- my question is very simple,
19 Dr. Asekomeh.

20 Was Mark Snookal determined to be unfit for
21 duty for a position in Escravos, Nigeria? Yes or no?

22 A. So a determination was made that he wasn't fit
23 for duty in Escravos but fit to work in Lagos.

24 Q. I understand that. My question simply was
25 about Escravos.

ERRATA SHEET

DEPOSITION OF DR. ESHIOFE ASEKOMEH

TAKEN OCTOBER 10, 2024

MARK SNOOKAL V. CHEVRON U.S.A., INC.

CASE NO. 2:23-cv-06302-HDV-AJR

CITATION	CHANGE	REASON
2:17	Replace “In-House Counsel for Chevron ” with “In-House Counsel for Chevron Nigeria, Limited ”	Reporter error.
4:6	Replace “ ASEKOMEHE ” with “ ASEKOMEH ”	Reporter error.
84:12	Replace “what it taught ” with “what he thought ”	Reporter error.
108:3	Replace “ Except their criteria is international criteria ” with “ Except there are criteria, international criteria ”	Reporter error.
110:18	Replace “ several ” with “ cerebral ”	Reporter error.

Dated: 11/11/2024

DocuSigned by:
ESHIOFE ASEKOMEH
FC2DBA2DC50A4CA
Deponent: DR. ESHIOFE ASEKOMEH

Dr. Eshiofe Asekomeh

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CERTIFICATE OF STENOGRAPHIC REPORTER

I, RACHEL N. BARKUME, a Certified Shorthand Reporter of the State of California, hereby certify that the witness in the foregoing deposition,

DR. ESHIOFE ASEKOMEH, was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place therein named; that the testimony of said witness was stenographically reported by me, a disinterested person, and was thereafter transcribed into typewriting.

Pursuant to Federal Rule 30(e), transcript review was requested.

I further certify that I am not of counsel or attorney for either or any of the parties to said deposition, nor in any way interested in the outcome of the cause named in said caption.

DATED: October 13, 2024.

Rachel N. Barkume

Rachel N. Barkume, CSR No. 13657, RMR, CRR